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Next Friend of Y.G.

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

WYATT B. and NOAH F., by their next friend
Michelle McAllister; KYLIE R. and ALEC R.
by their next friend, Kathleen Megill Streck;
UNIQUE L. by her next friend, Annette
Jaeger; SIMON S. by his next friend Paul
Aubry; RUTH T. by her next friend Michelle
Bartov; BERNARD C. by his next friend Ksen
Murry; NAOMI B. by her next friend Kathleen
Megill Streck; and NORMAN N. by his next
friend Tracy Gregg, individually and on behalf
of all others similarly situated,

Plaintiffs,

vs.

TINA KOTEK, Governor of Oregon in her
official capacity; FAIRBORZ PAKSERESHT,
Director, Oregon Department of Human Services
in his official capacity; APRILLE FLINT-
GERNER, Director, Child Welfare in her
official capacity; and OREGON
DEPARTMENT OF HUMAN SERVICES,

Defendants.

Civil No. 6:19-CV-00556-AA

DECLARATION OF DAVID L.
KRAMER IN SUPPORT OF
MOTION BY COUNSEL FOR
INTERVENOR TO WITHDRAW AS
ATTORNEY OF RECORD

I, DAVID L. KRAMER, do declare as follows:

1. On or about September 24, 2020, I filed in the above-captioned case a Motion to

Intervene and to Modify Protective Order on behalf of Steven J. Russell, who at that

- time was on record as the Best Friend of Y.G. in the case of *Y.G., et seq., vs. State of Oregon, et al.*; USDC Case No. 3:19-cv-01870-AC;
2. That Motion was made to obtain access, under Protective Order, to discovery that would have been helpful in pursuing Y.G.'s stance in USDC Case No. 3:19-cv-01870-AC;
 3. Ultimately, this Court denied our Motion to Intervene by Opinion and Order entered in this case on September 28, 2022;
 4. Since I no longer represent Y.G. in USDC Case No. 3:19-cv-01870-AC, and the Court's Order denies Y.G. or his current counsel to access discovery in this matter, I am requesting that the Court enter an Order allowing me to withdraw as attorney of record for Y.G. and his representative in this case., with no new counsel assigned to Y.G.'s representation in this matter; and
 5. Y.G. is now an adult and is represented by Mr. James Healy of the Gatti Law Firm in Salem, Oregon in *Y.G., et seq., vs. State of Oregon, et al.*; USDC Case No. 3:19-cv-01870-AC. I have conferred with Mr. Healy and he does not object to the Motion for me to withdraw.

This Declaration supports my Motion by Counsel for Intervenor to Withdraw as Attorney of Record.

I hereby declare that the above statement is true to the best of my knowledge and belief, and I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED this 19th day of April, 2024

/s/ David L. Kramer
David L. Kramer, OSB No. 802904